



February 25, 2015

REQUEST FOR PUBLIC RECORDS

Maggie Waldon
US Environmental Protection Agency
895 Faulkner Road
Santa Paula, CA 93606

Re:	Our Client:	Hartford Insurance Company
	Insured:	Santa Clara Waste Water
	Our File No.:	3001-4288
	Claim/Event Nos.:	CP0016017668
	Date of Loss:	11/18/2014
	Loss Location:	2775 N. Ventura Road, #209 Oxnard, CA 93036

Dear Agent Waldon:

This firm represents Hartford Fire Insurance Company in its subrogation pursuits with reference to the location referenced above. Pursuant to California Government Code Section 6250-6270 (The California Public Information Act), and 5 U.S.C. Section 552 (The Freedom of Information Act), we request the following documents and information:

1. All written reports regarding the subject chemical spill/explosion, including investigation reports, consultants' reports, witness statements, debriefing statements, command and control records, dispatch records, or any other written document regarding the subject chemical spill/explosion, from November 18, 2014 to the date of your response to these requests;
2. Any and all photographs of the chemical spill/explosion scene in the possession of the US Environmental Protection Agency or other department, taken on November 18, 2014 or at any time thereafter;
3. Any and all audio, video, digital or other electronic documents and communications records regarding the subject the chemical spill/explosion or scene, from November 18, 2014 through the date of your response to these requests; and

Documents responsive to these requests include, but are not limited to, written and electronic documents of all types, including drawings and diagrams, communications of all types, photographs, videotapes and audiotapes.

Please contact me at the phone number listed above if you have any questions. We will pay reasonable fees for production of the requested records.

Thank you for your attention to these requests. I look forward to your prompt response.

Very truly yours,

Danielle R. Baker, Paralegal
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